

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-11314-PBS

ST. PAUL TRAVELERS, as successor in
interest to ATLANTIC MUTUAL
INSURANCE CO. Marine Division, subrogee
of IBEX LLC, and IBEX, LLC

Plaintiffs

v.

FAIRHAVEN SHIPYARD, INC., and A.I.
MARINE ADJUSTERS, INC., a member of
AMERICAN INTERNATIONAL GROUP,
INC.,

Defendants

PARTIES PROPOSED AGENDA FOR
SCHEDULING CONFERENCE

The parties jointly propose the following schedule for the Scheduling Conference, set down for Thursday, October 28, 2004:

- (1) Facts of Case/Background;
- (2) Plaintiffs' Claims Against Fairhaven Shipyard;
- (3) Plaintiffs' Claims Against A.I. Marine Adjusters;
- (4) A.I. Marine Adjusters' Motion to Dismiss;
- (5) Possibility of Prompt Resolution;
- (6) Proposed Discovery Plan;
- (7) Schedule for the Filing of Motions; and

(8) Referral to Magistrate Judge, or alternative dispute resolution.

Respectfully submitted,

Plaintiffs,

ST. PAUL TRAVELERS as successor in
interest to ATLANTIC MUTUAL
INSURANCE CO. Marine Division, subrogee
of IBEX LLC, and IBEX, LLC

By their attorney,

s/ William Hewig, III

William Hewig, III (BBO# 541910)
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Defendant,

A.I. MARINE ADJUSTERS, INC.

By its attorneys,

s/ Robert M. Elmer

James J. Duane, III Esq. (BBO # 136500)
Robert M. Elmer, Esq. (BBO #640269)
Taylor Duane Barton and Gilman, LLP
111 Devonshire Street
Boston, MA 02109

Defendant,

FAIRHAVEN SHIPYARD, INC.

By its attorney,

s/ John F. Leahy

John F. Leahy, Esq. (BBO # 289860)
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